

# **EXHIBIT 8**

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

EDEN ROGERS

and

BRANDY WELCH,

Plaintiffs,

vs.

CASE NO. 6:19-CV-01567-JD

UNITED STATES DEPARTMENT OF HEALTH AND HUMAN  
SERVICES; ALEX AZAR, in his official capacity as  
Secretary of the UNITED STATES DEPARTMENT OF HEALTH  
AND HUMAN SERVICES; ADMINISTRATION FOR CHILDREN AND  
FAMILIES; LYNN JOHNSON, in her official capacity as  
Assistant Secretary of the ADMINISTRATION FOR  
CHILDREN AND FAMILIES; STEVEN WAGNER, in his  
official capacity as Principal Deputy Assistant  
Secretary of the ADMINISTRATION FOR CHILDREN AND  
FAMILIES; HENRY MCMASTER, in his official capacity  
as Governor of the STATE OF SOUTH CAROLINA;  
and MICHAEL LEACH, in his official capacity as  
State Director of the SOUTH CAROLINE DEPARTMENT OF  
SOCIAL SERVICES,

Defendants.

VIDEOTAPED VTC

30 (b) (6)

DEPOSITION OF: MIRACLE HILL MINISTRIES, INC.  
BY: REID DAVID LEHMAN  
(Appearing by VTC)

DATE: June 17, 2021

TIME: 9:20 AM

LOCATION: Haynsworth, Sinkler, Boyd  
1 North Main Street, 2nd Floor  
Greenville, SC

TAKEN BY: Counsel for the Plaintiffs

REPORTED BY: Susan M. Valsecchi, RPR, CRR  
Certified Realtime Reporter  
(Appearing by VTC)

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ALSO PRESENT:

Darren Carreras, Videographer  
Rick Christian, Concierge  
Maia Zelkind, Paralegal

(INDEX AT REAR OF TRANSCRIPT)

1           A.    I think my estimate was 30 to  
2   50 percent. So my belief is that 60 to 100 CPAs,  
3   would now or soon cease serving as foster families  
4   if Miracle Hill was not able to be the support  
5   system for them.

6           Now, I also said that when you talk to  
7   Sharon, she'll have a better estimate, and I would  
8   trust her estimate over mine.

9           Q.    Because your estimate is more of a  
10   guess?

11          A.    No, because Sharon is the one that  
12   helped me form my estimate, and I think that she --  
13   she would be able to have a more accurate estimate  
14   than I would.

15          Q.    We had talked earlier about -- way back  
16   in the beginning of this deposition -- about how  
17   you thought that more than 15 individuals had been  
18   turned away as prospective foster parents by  
19   Miracle Hill; do you recall that?

20          A.    Yes.

21          Q.    Why were those individuals turned away?

22          A.    You will have to ask Sharon.

23          Q.    Do you have any personal knowledge of  
24   those 15 individuals that you mentioned earlier?

25          A.    Well, no, I don't know -- I've not, as